

**EXHIBIT A**

PHILIP M. LUSTBADER  
DAVID LUSTBADER  
COUNSELLORS AT LAW  
A PROFESSIONAL CORPORATION  
615 WEST MT. PLEASANT AVENUE  
LIVINGSTON, NJ 07039  
(973) 740-1000

Attorneys for Plaintiff

PATRICIA J. PORCELLO

*Plaintiff*

vs.

THE WALT DISNEY COMPANY,  
EURO DISNEY S.C.A. d/b/a  
DISNEYLAND PARIS, EURO DISNEY  
ASSOCIES S.C.A. d/b/a DISNEYLAND  
PARIS and JOHN DOES 1-100

*Defendant*

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ESSEX COUNTY

DOCKET NO.

L-3911-13

CIVIL ACTION

**COMPLAINT**

**Patricia J. Porcello**, 18 Surrey Lane, East Hanover, New Jersey,  
complaining of The Walt Disney Company, Euro Disney S.C.A. d/b/a Disneyland  
Paris, Euro Disney Associates S.C.A. d/b/a Disneyland Paris and JOHN DOES 1-100,  
says:

COUNT ONE

1. Patricia Porcello purchased tickets for Euro Disney S.C.A. d/b/a  
Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris over the  
internet from her New Jersey home. These parties accepted her money in  
U.S. dollars and sold her tickets.

2. Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris solicited Patricia Porcello over the internet in New Jersey to purchase other services that they provided such as lunch and dinner.

3. In reliance upon the advertising and instructions from Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris, Patricia Porcello printed out her tickets and included a visit to Disneyland Paris in a trip to France.

4. On October 14, 2012, Patricia Porcello was at the premises owned, operated and maintained and controlled by Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris.

5. Due to the negligence and other actionable conduct of Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris, Patricia Porcello was injured when she slipped on a wet area inside the Star Wars ride.

6. An employee of Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disneyland d/b/a Disneyland Paris responded, took a statement and arranged for her to be transported to a hospital.

7. As the result of the negligence and actionable conduct of Euro Disney S.C.A. and Euro Disney Associates S.C.A. d/b/a Disneyland Paris, Patricia Porcello was rendered sick, sore, lame and disabled, has permanent personal injuries, has incurred surgery, and has had and will have future medical bills, lost wages and other special damages.

WHEREFORE, Judgment is demanded against Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris for damages, plus interest and costs.

COUNT TWO

1. All paragraphs of preceding Count are repeated.
2. The Walt Disney Company is the owner, operator and manager of Euro Disney S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris.
3. The Walt Disney Company created and are responsible for the concept and operations at Disneyland Paris.
4. Patricia Porcello was attracted to visit Euro Disney because of The Walt Disney Company's brand and because of its reputation..
5. The Walt Disney Company was negligent and otherwise committed actionable conduct in the ownership, operation, maintenance and control of Euro Disney specifically the area where Patricia Porcello was injured.

WHEREFORE, Judgment is demanded against The Walt Disney Company for damages, plus interest and costs.

COUNT THREE

1. All paragraphs of preceding Counts are repeated.
2. The Walt Disney Company holds itself out as the umbrella company that owns, operates, maintains and controls Euro Disney, S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris.
3. Patricia Porcello associated The Walt Disney Company with Disneyland Paris and relied on the reputation of The Walt Disney Company and the way in which it presents its other theme parks in choosing to visit Disneyland Paris.
4. The Walt Disney Company controls and is vicariously liable for the activities of Euro Disney, S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris.

5. The Walt Disney Company created the impression that it controls Euro Disney, S.C.A. d/b/a Disneyland Paris and Euro Disney Associates S.C.A. d/b/a Disneyland Paris and is operating same with its apparent authority.

WHEREFORE, Judgment is demanded against The Walt Disney Company for damages, plus interest and costs.

COUNT FOUR

1. All paragraphs of preceding Counts are repeated.

2. JOHN DOES 1-100 are individuals, partnerships or corporations that are responsible for the ownership, operation, maintenance and control of Euro Disney a/k/a Disneyland Paris.

3. On October 14, 2012, Patricia J. Porcello was at their facility and was injured due to their negligence.

4. As the result of the negligence and actionable conduct of JOHN DOES 1-100 , Patricia Porcello was rendered sick, sore, lame and disabled, has permanent personal injuries, has incurred surgery, and has had and will have future medical bills, lost wages and other special damages.

WHEREFORE, Judgment is demanded against JOHN DOES 1-100 for damages, plus interest and costs.


JURY DEMAND

A jury trial of six is demanded.

**DESIGNATION OF ATTORNEY**

David Lustbader, Esq. is designated trial attorney for the trial of this case.

**PHILIP M. LUSTBADER,  
DAVID LUSTBADER**  
A Professional Corporation  
Attorneys for Plaintiff

BY:   
DAVID LUSTBADER

**ATTORNEY CERTIFICATION**

I certify, pursuant to R.4:5-1, that, to the best of my knowledge, information and belief at this time, the matter in controversy is not the subject to any other action pending in any Court or any pending arbitration proceeding, that no other action or arbitration is contemplated and further, that there are no other parties who should be joined in this action.

  
DAVID LUSTBADER

DATED: May 20, 2013

FILED  
JUL 10 2013  
CLERK OF COURT  
U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
JUL 10 2013